

ENVIRONMENTAL SERVICES DEPARTMENT AIR QUALITY DIVISION

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Technical Guidance #TG98-007

October 1, 1998

Subject: Applicability to businesses not principally

engaged in the manufacture of furniture.

Issue: Does Rule 342 apply to businesses primarily engaged in other activities but which also manufacture furniture or perform furniture reconditioning and repair?

Discussion:

Rule: 342

- 1. Applicability of Rule 342 is to "any facility...applying finishing material to furniture or fixtures made of wood or wood-derived material."
- 2. Rule 342, Section 214 defines a facility as "activities... described by one or more of the industrial groupings listed in Section 238".
- 3. In all cases, the industrial groupings mentioned in Section 238 are described in the Standard Industrial Classification Manual of 1987 as "engaged in manufacturing". The paragraph under the heading "Major Group 25. Furniture and Fixtures, The Major Group as a Whole," specifically states "reconditioning and repair are classified in non-manufacturing industries".

Conclusion:

- 1. If a business is primarily engaged in other activities but also manufactures furniture, the furniture manufacturing activity is subject to Rule 342.
- 2. If a business, engaged in activities other than furniture manufacturing, performs furniture reconditioning and repair, the reconditioning and repair activities are not subject to Rule 342.